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January 20, 2021

**VIA ECF**

Hon. Alvin K. Hellerstein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

*Conf. adjourned until February  
19, 2021 at 10:00 a.m.  
X [Signature] 1/22/2021*

Re: *R.R. obo J.V.R. v. N.Y.C. Dep't of Educ., et al.* 20-v-5541(AKH)(KNF)

Dear Judge Hellerstein:

I am an Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, attorney for Defendant in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

Defendant respectfully requests an adjournment of the conference scheduled on January 29, 2021 at 10am to February 19, 2021 or a date there after convenient for the court. The reason for this request is conserve and respect Court resources, while the parties attempt to negotiate a settlement over the next three weeks once we receive the authority to make an offer from the Comptroller.

We note that in the overwhelming majority of these IDEA fees-only cases, the parties are able to resolve the action fully without needlessly burdening the Court with a conference. We also note that the mandated release of six attorneys who handled solely IDEA fees-only cases, a loss caused by the fiscal impact of COVID-19 on the City, reasonably slowed the progress in many of these cases. Defendant appreciates Plaintiff's patience and courtesy in consenting to this application. Accordingly, Defendant respectfully requests an adjournment of the conference scheduled on January 29, 2021 to February 19, 2021 or a date there after convenient for the court. This is the first request for an adjournment of the initial pretrial conference and does not affect any other deadlines.

Thank you for considering this request.

Respectfully submitted,

/s/

Martin Bowe  
Senior Counsel

cc: All counsel (via ECF)